

EXHIBIT 3

COPY

IN THE CIRCUIT COURT FOR MAURY COUNTY, TENNESSEE

FILED
KATHI KELLEY
CIRCUIT COURT CLERK
MAURY COUNTY, TN

2009 APR -3 PM 12:48

JACKIE TIDWELL,

Plaintiff,

v.

BIG LOTS STORES, INC., TV PRODUCTS
USA, INC. and ZHEJIANG JIANDI
TRADING & INDUSTRIAL CO., LTD.

Defendants.

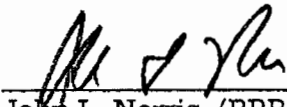
DOCKET NO. 11987

JURY DEMAND

MOTION FOR JUDGMENT BY DEFAULT AND
TO SET FOR HEARING ON THE ISSUE OF DAMAGES

Comes the plaintiff and moves this Court pursuant to Rule 55 of the Tennessee Rules of Civil Procedure for a judgment by default against the defendant Zhejiang Jiandi Trading & Industrial Co., Ltd., and for grounds would show that the First Amended Complaint, Alias Summons and Translations (in Chinese) were forwarded to the appropriate Chinese authority, that the Certificate regarding service reflects that the defendant "refused to accept the documents," that the defendant has failed to answer or otherwise plead as required by law and that this Court should enter a judgment by default against the defendant and set a hearing on the issue of damages. In support of this motion, plaintiff relies upon the attached Certificate of her counsel, upon the Notice of Filing Proof of Service filed on or about August 25, 2008, and on a supporting Memorandum.

NORRIS & NORRIS, PLC



John L. Norris (BPR #6007)
Christina Norris (BPR #6599)
Fifth Third Center
424 Church Street, Suite 1300
Nashville, Tennessee 37219
(615) 627-3959

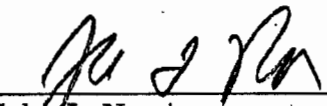
Attorneys for Plaintiff

PLEASE TAKE NOTICE THAT THE FOREGOING MOTION IS SET FOR HEARING ON FRIDAY, MAY 22, 2009, AT 9:00 A.M. FAILURE TO TIMELY FILE AND SERVE A RESPONSE TO THIS MOTION COULD RESULT IN THE GRANTING OF SAME.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of April, 2009, a copy of the foregoing Motion was forwarded via U.S. Mail, postage prepaid to:

Zhejiang Jiandi Trading & Industrial Co., Ltd.
Shihou Industrial Zone
Yongkang, Zhejiang 321306, China



John L. Norris

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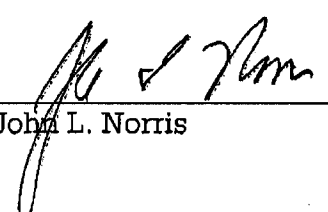
Defendants.

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JURY DEMAND

CERTIFICATE

I, John L. Norris, hereby certify that I have not received an answer or other pleading from the defendant Zhejiang Jiandi Trading & Industrial Co., Ltd. and that said defendant has failed to answer or otherwise plead as required by law in response to the First Amended Complaint.



John L. Norris